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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

TIMOTHY J. HOPKINS and SCOTT
HARPER,

Plaintiffs,

v.

JG ASSOCIATES, INC. and DOE
DEFENDANTS 1-10,

Defendants.

Case No. 12-cv-04542-RMB-AMD

NOTICE OF MOTION

TO: Charles M. Gibbs, Esq.
Michael A. Bowman, Esq.
Bowman & Partners, LLP
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Philadelphia, PA 19103

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Jenkintown, PA 19046

COUNSEL:

PLEASE TAKE NOTICE that on January 7, 2013, at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned, as counsel for defendant JG Associates, Inc., shall move before the Honorable Renee Marie Bumb, U.S.D.J., at the Mitchell Cohen

Federal Courthouse, 1 John F. Gerry Plaza, Fourth & Cooper Streets, Camden, New Jersey 08101, for the entry of an order (a) dismissing the complaint pursuant to Fed.R.Civ.P. 12(b)(6) for failure to state a claim on which relief can be granted and (b) declining to exercise supplemental jurisdiction over the claims asserted under the New Jersey Wage Hour Law.

PLEASE TAKE FURTHER NOTICE that in support of this motion, plaintiff shall rely upon the brief submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that defendant JG Associates, Inc. hereby requests oral argument in connection with this motion.

Respectfully submitted,

/s/ Peter J. Frazza
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DATED: November 30, 2012
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